

FILED
1/12/2022 LK

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)
)
 v.)
)
 SARAH DIAMOND)

1:22-CR-00018

No. **JUDGE SHAH**
MAGISTRATE JUDGE JANTZ
Violation: Title 18, United States
Code, Section 1365(a)(4)

COUNT ONE

The SPECIAL APRIL 2021 GRAND JURY charges:

1. At times material to this Indictment:
 - a. Defendant SARAH DIAMOND was a registered professional nurse licensed in the State of Illinois.
 - b. Defendant DIAMOND was employed as the Assistant Director of Nursing at a medical rehabilitation center in the Northern District of Illinois.
2. In or around August 2021, in the Northern District of Illinois, Western Division, and elsewhere,

SARAH DIAMOND,

defendant herein, with reckless disregard for the risk that another person would be placed in danger of bodily injury and under circumstances manifesting extreme indifference to such risk, tampered with a consumer product that affected interstate and foreign commerce, specifically, removed morphine from a bottle of liquid morphine prescribed to Patient A, and replaced it with another liquid, knowing that the diluted morphine was to be dispensed to Patient A;

In violation of Title 18, United States Code, Section 1365(a)(4).

COUNT TWO

The SPECIAL APRIL 2021 GRAND JURY further charges:

1. Paragraph 1 of Count One is incorporated here.
2. In or around August 2021, in the Northern District of Illinois, Western Division, and elsewhere,

SARAH DIAMOND,

defendant herein, with reckless disregard for the risk that another person would be placed in danger of bodily injury and under circumstances manifesting extreme indifference to such risk, tampered with a consumer product that affected interstate and foreign commerce, specifically, removed morphine from a bottle of liquid morphine prescribed to Patient B, and replaced it with another liquid, knowing that the diluted morphine was to be dispensed to Patient B;

In violation of Title 18, United States Code, Section 1365(a)(4).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY